

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re:

**MOTORS LIQUIDATION COMPANY, *et al.*,
f/k/a General Motors Corp., *et al.***

Debtors.

Chapter 11

Case No. 09-50026 (REG)

(Jointly Administered)

**[PROPOSED] ORDER APPROVING FED. R. CIV. P. 23(h) NOTICE FOR
AWARD OF ATTORNEY'S FEES PAID FROM CLAIM No. 51093
SETTLEMENT FUND**

UPON the motion, dated May 14, 2012 (the "Motion"), of *Anderson* Class Counsel Girard Gibbs LLP for an order, pursuant to Bankruptcy Rules 7023 and 9019 and Rule 23(h) of the Federal Rules of Civil Procedure, approving the form, content and manner of notice to the *Anderson* class members who submitted valid claims of an application for an award of attorney's fees to be paid out of the Claim No. 51093 settlement fund, upon the supporting Declaration of A. J. De Bartolomeo, sworn to on May 14, 2012 and upon the memorandum of law dated May 14, 2012; and due and proper notice of the Motion having been provided, and it appearing that no other or further notice of the Motion need to be provided; and the Court having found and determined that the request sought in the Motion is in the best interest all parties in interest; and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the Motion is granted as provided herein with respect to the approval of the form and content of the Notice annexed hereto as **Exhibit A**; and it is further

ORDERED that the hearing date on the motion for attorneys fees will be _____,
2012 at _____ a.m./p.m.; and it is further

ORDERED that the deadline to submit comments in support of or in opposition to the motion for attorneys fees will be _____, 2012; and it is further

ORDERED that the distribution method of the form of Notice is approved so that the Notice will be sent by first class U.S. Mail to all *Anderson* Claimants; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Dated: New York, New York
June __, 2012

Robert E. Gerber
United States Bankruptcy Judge